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June 30, 2022

DELIVERED VIA ECF

Honorable Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007-1312

The conference scheduled for July 7 is adjourned, and Plaintiff is granted leave to file the Second Amended Complaint.

Edgardo Ramos, U.S.D.J

Dated: June 30, 2022

New York, New York

Case Title: *Klauber Brothers, Inc. v. Boohoo Group PLC et al,*
1:21-cv-05273-ER
Re: **Request to Adjourn Initial Pretrial Conference and File**
Proposed Second Amended Complaint

Your Honor:

This office represents Plaintiff, Klauber Brothers, Inc. ("Klauber"), in the above-referenced matter. Pursuant to Rules 1A and 1E of Your Honor's Individual Practices in Civil Cases, we write to respectfully request an adjournment of the initial pretrial conference, currently scheduled for Thursday, July 7th at 10 am, (Dkt. #20) and for leave to file a proposed Second Amended Complaint, attached hereto as **Exhibit 1**. The reason for this request is that Klauber has identified additional products that it alleges are infringing. The requested adjournment will allow time for Defendants to investigate the additional products and for the parties to continue their discussions for resolution. Defendants all consent to the request for the adjournment and the filing of the proposed SAC. There have been no previous requests for an adjournment.

We thank Your Honor for consideration of this request.

Respectfully submitted,

By: /s/ Laura M. Zaharia
Scott Alan Burroughs
Laura M. Zaharia
DONIGER / BURROUGHS
For the Plaintiff